



May 17, 2023

Honorable John Michael Vazquez  
United States District Judge for the District of New Jersey  
Martin Luther King Building and US Courthouse  
50 Walnut Street, Newark, N.J. 07101

Re: USA v. AED, et al, Crim. No. 22-165 (JMV)

Dear Judge Vazquez:

Speaking on behalf of all defense counsel, I am attaching a Proposed Order Continuing Motions Deadlines which are not objected to. The parties have been working productively under Standing Order 15-2. Here are the new dates for submissions:

1. Defendants shall file any and all pretrial motions, pursuant to Federal Rules of Criminal Procedure 12(b) and 41(h), in the manner set forth in L. Civ. R. 7.1, on or before **June 14, 2023**;
2. The Government shall file any response to any Defendant's pretrial motion on or before **June 30, 2023**;
3. Defendants shall file any replies on or before **July 14, 2023**;
4. Oral argument on pretrial motions shall be held on **September 19, 2023 at 10:30 a.m.**

The government does not oppose defendants' request for more time to file their motions, but respectfully requests that the Court maintain the existing September 19, 2023 hearing date for those motions if possible.

Respectfully submitted.

A handwritten signature in black ink that reads "Elliot G. Sagor".

Elliot G. Sagor